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## Attorneys for the Debtor in Possession

**UNITED STATES BANKRUPTCY COURT**

**EASTERN DISTRICT OF CALIFORNIA**

**[Sacramento Division]**

In re:

**GREGORY G. SMITH, M.D.,  
A PROFESSIONAL  
CORPORATION.**

**Debtors.**

Case No. 20-24783-A-11  
Docket Control No. MHK-4

Date: February 22, 2021

Time: 1:30 p.m.

Dept: A (Courtroom 28)

**Hon. Fredrick E. Clement**

**JOINT STATUS REPORT FOR  
DEBTOR IN POSSESSION'S OBJECTION TO PROOF OF CLAIM  
NO. 1 FILED BY MEMORY REHABILITATION MED. GROUP**

Gregory G. Smith, M.D., a Professional Corporation, as debtor in possession (the "Debtor") and Memory Rehabilitation Medical Group (the "Claimant") hereby submit their Joint Status Report for the above-referenced contested matter.

## I. PROCEDURAL POSTURE

1. At the initial hearing on December 21, 2020, the parties argued their positions, and the court continued the hearing to February 22, 2021, thereby permitting the parties to serve discovery.

2. After consultation between counsel, the Debtor's counsel served on the Claimant a set of interrogatories and a request for production of documents. A response is due on or about February 10, 2021, but it has not yet been served on the Debtor's counsel.

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3. The Claimant has not served discovery in connection with this contested matter.

## **II. SUGGESTIONS FOR BRIEFING SCHEDULE**

4. Depending on the content of the Claimant's responses to the Debtor's pending discovery, it may be necessary that the Debtor seek discovery of Gregory G. Smith, M.D., the individual whose signature appears on the purported contract for services on which the Claimant has based its claim. As such, the parties suggest that a continued hearing be set on the Objection for April 20, 2021 at 1:30 p.m., at which time a final hearing could be set.

Dated: 2-2-21

REYNOLDS LAW CORPORATION

By:   
Stephen M. Reynolds  
Attorneys for the Claimant

Dated: Feb. 3 2021

MEEGAN, HANSCHU & KASSENBROCK

By:   
Anthony Asebedo  
Attorneys for the Debtor